

February 28, 2019

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

**Re: WC Docket Nos. 17-287, 11-42, and 09-197**

Dear Ms. Dortch:

On Tuesday, February 26, 2019 several public interest and advocacy organizations met with Jessica A. Zufolo, Senior Advisor, Strategic Partnerships, for the Universal Service Administrative Co. (USAC). Attending the meeting were: Carmen Scurato, Dana Floberg and Leo Fitzpatrick of Free Press; Yosef Getachew, Common Cause; Francella Ochillo, National Hispanic Media Coalition; Eric Null, New America, Open Technology Institute; and Olivia Wein, National Consumer Law Center.

The next day on Wednesday, February 27, 2019 the following individuals met with Allison Baker, Jodie Griffin, Trent Harkrader, Allison Jones, and Ryan Palmer from the Federal Communications Commission (FCC) Wireline Competition Bureau. Attending the meeting were: Dana Floberg and Leo Fitzpatrick of Free Press; Yosef Getachew, Common Cause; Cheryl Leanza, United Church of Christ, OC Inc.; Eric Null, New America, Open Technology Institute; Francella Ochillo, National Hispanic Media Coalition; Erin Shields, Center for Media Justice; and Olivia Wein, National Consumer Law Center.

In the meeting with USAC, the groups reiterated concerns raised in comments submitted to the FCC regarding verification processes of the National Lifeline Eligibility Verifier, and our strong desire to lower barriers of entry into the Lifeline program. Specifically, we pointed to the burdensome expiration date requirement for SNAP cards and the latitude/longitude requirements for individuals without a U.S. Postal Service recognized address (an issue that affects urban unhoused individuals as well as remote rural Tribes). We also discussed how the paper application needs further clarity, and needs to take into consideration obstacles for unhoused individuals who do not have a residence to report on the application and do not have requisite internet access to obtain their latitudinal and longitudinal location as a replacement for a standard street address. It is unfairly burdensome to require such individuals to obtain access to an online map. Additionally, we strongly encouraged USAC and FCC staff to attend and learn from National Verifier community trainings with direct service providers that work with Lifeline-eligible populations in the Washington, DC area. Finally, we also expressed the desire for continued engagement to ensure that the National Verifier is streamlined, efficient, and helps eligible low-income individuals get connected to the services they need.

The groups raised the same points in the meeting at the FCC. In addition, we explored reasons for attrition in the Lifeline program, suggested increasing public awareness of the program as one possible solution, and discussed the need for greater transparency and data—regarding subscribership and the overlay of relevant demographic information—to be able to diagnose the causes. We requested that the Commission affirmatively reject the proposals in the Commission’s 2017 Lifeline Notice to eliminate the uncertainty they create for Lifeline providers and subscribers. We voiced our support for the Commission’s planned development of an application programming interface (API) and broad access to databases such as SNAP and CMS that will efficiently and quickly verify customer eligibility for Lifeline. As we raised in the meeting with USAC, we underscored the need for greater engagement with consumer and advocacy groups, with particular attention to involving direct low-income service providers and community-based organizations in a feedback loop. We also reiterated our strong support for customer access to no-cost services.

Ms. Leanza also expressed concern, as a number of advocates did in the modernization docket,<sup>1</sup> that Lifeline minimum standards will increase and a compensation for voice service will decline at the end of 2019 before the Commission has an opportunity to thoroughly evaluate the current Lifeline marketplace.

Respectfully Submitted,

/s/ Carmen Scurato

Carmen Scurato

Senior Policy Counsel

Free Press

(202) 265-1490

cscurato@freepress.net

---

<sup>1</sup> See Letter from Dallas Harris, Policy Fellow, Public Knowledge to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Mar. 17, 2016).